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Cadila Healthcare, Limited

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TAKEDA PHARMACEUTICAL
COMPANY LIMITED, TAKEDA
PHARMACEUTICALS NORTH
AMERICA, INC., TAKEDA
PHARMACEUTICALS LLC,
TAKEDA PHARMACEUTICALS
AMERICA, INC., and ETHYPHARM,
S.A.,

Plaintiffs,

v.

ZYDUS PHARMACEUTICALS USA
INC. and CADILA HEALTHCARE
LIMITED,

Defendants.

CIVIL ACTION NO:
3:10-CV-01723-JAP-TJB

Return Date: July 16, 2012

Oral Argument Requested

**NOTICE OF MOTION FOR
RECONSIDERATION OF ORDER
DENYING-IN-PART LEAVE TO
AMEND PRELIMINARY
INVALIDITY AND NON-
INFRINGEMENT CONTENTIONS**

To: Attached Service List

PLEASE TAKE NOTICE that on July 16, 2012, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare, Limited (collectively “Defendants” or “Zydus”),

shall move, through its attorneys Kelley Drye & Warren LLP, before the Hon. Tonianne J. Bongiovanni for Reconsideration of Order Denying-in-Part Leave to Amend Preliminary Invalidity and Non-infringement Contentions.

PLEASE FURTHER TAKE NOTICE that in support of this motion, Zydus shall rely upon Defendants' Memorandum of Law in Support of Motion for Reconsideration of Order Denying-in-Part Leave to Amend Preliminary Invalidity and Non-infringement Contentions and the Supporting Declaration of Vincent P. Rao II.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE FURTHER TAKE NOTICE that a proposed form of Order is submitted herewith in accordance with L. Civ. R. 7.1(e).

Dated: June 19, 2012

KELLEY DRYE & WARREN LLP

By: /s/ Vincent P. Rao II
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Zydus Pharmaceuticals USA, Inc. and
Cadila Healthcare Limited

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2012 I caused to be served a copy of the foregoing Defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare's Notice of Motion For Reconsideration Of Order Denying-In-Part Leave To Amend Preliminary Invalidity And Non-Infringement Contentions, and Supporting Declaration of Vincent P. Rao II, with Exhibits and a Proposed Order on each interested party in this action in accordance with the electronic filing procedures of the United States District Court for the District of New Jersey and via ECF on the following.

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Dated: June 19, 2012

s/Vincent P. Rao II
Vincent P. Rao II